Decision 03-09-018 September 4, 2003

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) for Authority to Institute a Rate Stabilization Plan with a Rate Increase and End of Rate Freeze Tariffs.	Application 00-11-038 (Filed November 16, 2000)
Emergency Application of Pacific Gas and Electric Company to Adopt a Rate Stabilization Plan. (U 39 E)	Application 00-11-056 (Filed November 22, 2000)
Petition of THE UTILITY REFORM NETWORK for Modification of Resolution E-3527.	Application 00-10-028 (Filed October 17, 2000

ORDER IMPLEMENTING ALLOCATION OF THE SUPPLEMENTAL 2003 REVENUE REQUIREMENT DETERMINATION OF THE CALIFORNIA DEPARTMENT OF WATER RESOURCES

Summary

The California Department of Water Resources (DWR) has submitted a supplemental revenue requirement determination for 2003 that (1) updates its previously forecasted costs, revenues and required reserve levels, and (2) reduces its 2003 revenue requirement by $1.002 billion. This Decision allocates DWR's updated revenue requirement, as well as the $1.002 billion

reduction, among the ratepayers of the three major investor-owned utilities using the same methodology as the Commission applied in Decision (D.) 02-12-045.[1]

Utility customers taking bundled service will receive the $1.002 billion reduction in the form of a one-time bill credit. In addition to the one-time bill credit, we also calculate new DWR power charges for bundled customers to reflect DWR's revised revenue requirement for 2003. These revised power charges take effect immediately. Unless otherwise specified, references to "customers" in this order refer to bundled customers. While 100% of the DWR reduction is being credited to bundled customers pursuant to this order, some portion of the reduction is attributable to direct access (DA) and departing load (DL) cost responsibility. We make no determination here, however, as to the specific portion of the reduction that may be attributable to DA or DL cost responsibility. Allocation of any applicable share of the reduction to DA and DL customers, and any resulting adjustments to DA/DL cost responsibility will be determined in R.02-01-011. Any final allocation of the 2003 DWR revenue requirement redetermination to DA and DL customers will be applied on a consistent basis with the assumptions applied in this order to ensure that no costs attributable to DA and DL customers are shifted to bundled customers, in accordance with the principles outlined in D.02-03-055.

Background

In D.02-12-045, this Commission stated that a supplemental revenue requirement determination from DWR would allow for a more accurate and equitable allocation of DWR's 2003 revenue requirement, and would also likely

[1] Subsequently modified on other issues.

result in a significant reduction in the total amount of DWR's 2003 revenue requirement:

> [I]n order for us to optimize our allocation for 2003, we need DWR to update it's modeling efforts to incorporate direct access migration, to provide all parties an equal opportunity to contribute to the modeling assumptions and inputs, to treat sales of excess energy consistently with the protocols adopted in D.02-09-053, and to refine assumptions regarding ancillary services and cash reserve levels. (D.02-12-045, p. 3.)

The reduction in the cash reserve-related portion of DWR's revenue requirement was expected as a consequence of the utilities resuming the procurement obligation from DWR beginning in January 2003, but DWR would not concur with such a reduction prior to the utilities actually beginning to procure their own net short amounts. (Id., pp. 47-49.) We could not require DWR to reduce its revenue requirement, nor could we require them to submit a supplemental determination for 2003, so we strongly encouraged DWR to promptly submit a supplemental determination (early in 2003) reflecting the reduced revenue requirement. (Id., pp. 3, 48, 53.)

DWR submitted a supplemental determination of its 2003 revenue requirement on July 1, 2003. According to DWR:

> The Department has concluded that a supplemental revenue requirement determination addressing the following issues would be useful to the Commission in adjusting the allocation of revenue requirements established by Decision 02-12-045, and would provide benefit to the retail rate payers of the IOUs.
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> - Sales of excess energy (Decision 02-09-053);
> - Ancillary services/ISO expenses;
> - Contract renegotiations;
> - Fuel costs;
> - WAPA energy supplies and associated remittance treatment;
> - Direct Access Cost Responsibility Surcharge;

- Cash reserve levels (Operating Account and Operating Reserve Account);
- Hydroelectric conditions in California and the Pacific Northwest;
- Other proposed changes received from parties on December 30, 2002;
- Sensitivity analysis; and
- Results of bond sales.

DWR stated that, taking into account the factors listed above, "the amount in the Operating Account on July 1, 2003, in excess of the amount then required (if DWR charges were not modified) is projected to be $1.002 billion." (DWR Supplemental Determination, pp. 5, 7.)

A prehearing conference (PHC) was held on July 8, 2003, immediately followed by a workshop facilitated by staff from the Commission's Energy Division. Energy Division prepared and revised (with input from the parties) tables showing a proposed allocation of DWR's supplemental 2003 revenue requirement based upon our allocation in D.02-12-045.

Comments were received on July 25, 2003 from Pacific Gas and Electric (PG&E), Southern California Edison (SCE), San Diego Gas & Electric (SDG&E), California Large Energy Consumers Association (CLECA), The Utility Reform Network (TURN), and the Commission's Office of Ratepayer Advocates (ORA). Comments from the California Farm Bureau Federation (CFBF) were received significantly after the noon deadline, but with no explanation or request for leave for late service. CFBF's Comments will be considered, but will be given less weight. Reply Comments were received on August 4, 2003 from the same parties, plus a group of departing load customers[2] (DL Customers). We also received a Memorandum from DWR, functioning as Reply Comments.

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[2] Kimberly Clark Corporation, THUMS Long Beach Company, and Valero Refining Company.

The scope and issues to be addressed in this phase of this proceeding were set forth by ALJ Allen (in coordination with ALJ Pulsifer) in a Ruling[3] issued July 15, 2003:

> Please note that the scope of this phase of this proceeding is limited by the Commission's earlier Decision (D.) 02-12-045. [fn. omitted.] In that decision, the Commission stated:
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> > In order to avoid unnecessary delay in implementing the revised allocation, the Commission will use the methodology approved today, with the exception of the allocation of ancillary services. Re-litigation of the allocation methodology will not be allowed (again with the exception of ancillary services), absent extraordinary circumstances. (D.02-12-045, p. 43.)
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> Accordingly, the scope of this phase of this proceeding will apply the allocation methodology previously adopted by the Commission to DWR's supplemental determination. [fn. omitted.] Energy Division's July 15 tables will apply the methodology adopted in D.02-12-045 to DWR's supplemental determination of its 2003 revenue requirement.
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> In their opening (July 25) Comments, parties should specifically propose how the reduction in DWR's 2003 revenue requirement should flow back to ratepayers. Parties should be aware of the language in the Addendum to the Summary of Material Terms of Financing Documents (Addendum) [fn. omitted], which states in relevant part:
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> > …Unless otherwise agreed by both the CPUC and DWR, each acting in their own discretion, any Excess Amounts remaining after application to the uses described in the preceding sentence, shall be used, at the direction of CPUC, after consultation with DWR, to (i) adjust DWR Charges or (ii) with the agreement of DWR, reduce debt outstanding under the proposed Bond Indenture, in all instances, upon consideration of the interests of the retail

[3] Administrative Law Judge's Ruling Establishing Procedural Schedule.

> customers of the Electrical Corporations, DWR and, if applicable, ESP retail customers.[4]

Accordingly, in this proceeding, absent the agreement of DWR, we must pass through the reduction in DWR's 2003 revenue requirement by adjusting DWR Charges.[5] In other words, we need to reduce the charges that ratepayers pay to DWR (which the utilities collect on behalf of DWR), not just the utilities' remittances to DWR.

If parties wish to propose any other method for passing the reduction back to ratepayers, they should be aware that such a method requires the agreement of DWR and the Commission, and should provide support for why DWR and the Commission should agree to depart from the pre-approved terms of the Addendum. Parties whose proposals are consistent with the language of the Addendum should address which DWR Charges should be adjusted, by how much, over what period of time, and the mechanics of how the adjustment would be done. All parties should discuss how their proposal is consistent with the interests of retail customers and the existing Servicing Agreements between the utilities and DWR.

Since direct access and departing load customers share responsibility with bundled customers for the 2003 DWR revenue requirements pursuant to a series of Commission orders issued in R.02-01-11, parties' proposals shall take into account the appropriate allocation of 2003 DWR costs to direct access and departing load customers. A separate ruling was issued in R.02-01-011 on June 24, 2003 to implement a process in coordination with this proceeding to quantify the appropriate portion of the 2003 DWR revenue requirement redetermination allocable to direct access and departing load customers. Such customers are currently subject to a fixed cost responsibility

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[4] Addendum, Section 3, re disposition of the Operating Reserve Account. Section 5 of the Addendum states that excess amounts in the Operating Account "shall be utilized in the same manner" as set forth in Section 3.

[5] Examples of "DWR Charges" include the Power Charge and the Bond Charge.

surcharge cap, and bundled customers currently absorb shortfalls in cost recovery from Direct Access and Departing Load customers subject to future reimbursement. An accurate allocation of the 2003 DWR revenue requirements to direct access and departing load customer groups is essential, therefore, to assure that undercollections in cost recovery are accurately finalized for future reimbursement to bundled customers. In the interests of coordination, a copy of this ruling shall be served on parties in the direct access rulemaking (R.02-01-011) for information purposes.

Any party that intends to argue that other utility rates should be (or automatically will be) altered as a consequence of a reduction in DWR Charges (e.g. other rates would increase to offset the reduction in the DWR Charges) must provide in its opening Comments a clear basis for that position, including any supporting legal authorities and policy arguments. This direction also applies to PG&E's proposals to net "WAPA true-up" remittances against the reduction in DWR's revenue requirement, and to incorporate the reduction in PG&E's post-bankruptcy rates. (PG&E PHC Statement, pp. 2-6.)

Allocation

As described above, D.02-12-045 generally barred re-litigation of the allocation methodology. (p. 43.) In general, parties' Comments do not take issue with the methodology adopted in D.01-12-045, nor with Energy Division's calculations applying that methodology to the supplemental determination.[6]

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[6] SCE argued in its PHC statement and at the PHC that the Commission should reconsider the allocation methodology adopted for 2003, and should adopt a "cost-follows-contracts" methodology, as previously advocated by SCE. ALJ Allen rejected that argument as inconsistent with D.02-12-045 on the grounds that SCE did not provide persuasive evidence of the existence of "extraordinary circumstances." We confirm that ruling.

Accordingly, we apply the original 2003 allocation methodology to both (1) our revised allocation of DWR's supplemental 2003 revenue requirement and (2) the allocation of the $1.002 billion reduction in DWR reserves.

First, we apply this methodology to DWR's revenue requirement and calculate new DWR power charges for the bundled customers of each IOU. In response to comments on the Draft Decision, we clarify for parties that this step would be necessary whether or not DWR had identified any excess funds, simply to reflect DWR's updated information about 2003 costs and revenues in our allocation of DWR's annual costs to the customers of each IOU, as we stated was our intention in D.02-12-045.

As we anticipated in D.02-12-045, certain items contributing to DWR's forecast revenue requirement have been updated, and result in lower costs to ratepayers (e.g., ancillary services). However, the costs related to other items have been revised upward by DWR (e.g., power costs and DWR's operating budget). These adjustments are completely apart from the one-time return of the $1.002 billion in excess funds. The table below summarizes the changes that DWR made in its supplemental revenue requirement.

	Original DWR Filing		2003 Supplemental		
	DWR August 16 Determination, Table A-1	Decision 03-02-031, Table C	Table C of This Decision		Change from D.03-02-031 to This Decision
2003 DWR Power-related Expenses					
Power Costs	$4,119,902,243	$4,119,902,243	$4,627,763,007		$507,860,764
Administrative and General Expenses	$28,400,000	$28,400,000	$48,501,501		$20,101,501
Ancillary services	$170,454,426	$170,454,426	$21,750,000		($148,704,426)
Total DWR Power-related Expenses	**$4,318,756,669**	**$4,318,756,669**	**$4,698,014,508**		**$379,257,839**
Less: Revenue from Sales of Excess Power	$128,885,940	$35,483,282	$132,213,327		$96,730,045
Less: Interest Earnings on Fund Balances	$59,007,505	$59,007,505	$32,355,702		($26,651,803)
Total Offsetting Revenues	**$187,893,445**	**$94,490,787**	**$164,569,029**		**$70,078,242**
Subtotal before Operating Fund Adjustment	**$4,130,863,224**	**$4,224,265,882**	**$4,533,445,479**		**$309,179,597**
Adjustment to Meet Operating Fund Target	$517,399,690	$291,593,306	($69,537,530)		($361,130,836)
Total Ratepayer Revenue Requirement	**$4,648,262,914**	**$4,515,859,188**	**$4,463,907,949**		**($51,951,239)**

As DWR noted in its July 1st submittal, it has updated the energy modeling that served as the basis for the Commission's original allocation in D.02-12-045. The Commission can therefore no longer rely on the outdated allocation percentages from that decision, and must update them to incorporate the new modeling information provided by DWR. As shown below, the updated allocation percentages are slightly different from those adopted in D.02-12-045.

	Allocation Shares from D.02-12-045, as modified by D.03-02-031	Revised Share of Allocated DWR costs
PG&E	43.66%	44.33%
SCE	42.10%	42.16%
SDG&E	14.24%	13.51%
Total	100.00%	100.00%

The new data and the steps that we follow to derive this updated allocation are presented in Appendix A to this decision. The revised allocation results in the updated DWR power charges shown in the attached Table C.

Based on comments on the Draft Decision, we clarify our intent regarding our approach to the calculation of the revised DWR power charges that we adopt today.

First, in its comments on the Draft Decision, DWR expresses concern that the revised Power Charges calculated for each IOU in the Draft Decision would have the result that DWR's year-end 2003 Power Charge accounts balance would fall approximately $81 million below its projected level of $1.357 billion (DWR comments, p. 2). The Commission's Energy Division has revised its calculation of the Power Charge for each IOU to ensure that, based on the forecast information and modeling inputs provided by DWR, the projected year-end balance in the Power Charge accounts is $1.357 billion.

Second, the three IOUs offer diametrically opposed recommendations regarding whether we need to change the power charges at all in this decision. In their comments on the Draft Decision, PG&E and SCE oppose any change to the DWR Power charge (or "remittance rate") for the remainder of 2003. PG&E states that "there is no need for remittance rate revisions as part of this proceeding" (PG&E comments, p. 11), while SCE states that "there is no need for the Commission to establish a new remittance rate for the remainder of 2003" (SCE comments, p. 8) and goes so far as to propose deleting from our final decision the tables that calculate the allocation of DWR costs to each IOU and the resulting remittance rates. SDG&E, on the other hand, recommends that "the Commission should revise the utilities' remittance rates to reflect the updated allocation percentages for the remainder of 2003", while suggesting an additional ordering paragraph that specifies that "…bundled customer commodity charges will not change with the implementation of these new power charges" (SDG&E comments, p. 4 and Appendix A). SDG&E's comments reflect the correct understanding of the Commission's intent (and obligation) in this decision.

As DWR points out in its comments on the Draft Decision, pursuant to the terms of the Rate Agreement between the Commission and DWR, "the Commission must establish DWR charges 'sufficient to provide moneys in the amounts and at the times necessary to satisfy the Retail Revenue Requirements as specified by the Department' (in this case, taking into account any applicable Direct Access Cost Responsibility Surcharge revenues expected to be remitted to DWR from the IOUs during 2003)." (DWR comments, p. 2, fn. omitted). DWR's July 1, 2003 Supplemental Determination not only provided updated cost estimates for every expense item contained in its original August, 2002 determination, but updated the forecast of DWR power deliveries to each IOU as well. Since each IOU's customer's DWR power charge is no more than the result of dividing its allocated share of DWR costs by the volumes delivered to that IOU's customers, once we update the costs allocated to each IOU, as we have done in this decision, it is only logical that we must change the effective IOU power charges as well.

However, while we do calculate and order remittances using revised IOU power charges in this decision, at the same time we acknowledge, as PG&E observed in its comments, that "it is true that remittance rates either have been or will be adjusted for other reasons, such as to reflect the remittance of the direct access power charge to DWR, and the implementation of the DWR bond charge for direct access customers. But those changes are being addressed elsewhere, and need not be addressed here." (PG&E Comments on Draft Decision, p. 11.) In addition, SCE states that "if the Commission decides to retain Table C and Appendix A, the [Cost Responsibility Surcharge] revenues from SCE's [Direct Access] customers should be corrected" to reflect that SCE forecasts receipt of $53 million more revenues than shown in the Draft Decision (SCE comments, p. 9).[7]

To resolve this matter, we note that in Ordering Paragraph 10 of D.02-12-045, we directed that SCE, PG&E, and SDG&E shall file advice letters with revised tariffs to implement the Direct Access Cost Responsibility Surcharge (DA CRS) at the interim capped level of 2.7 cents per kWh approved in

[7] In its July 1 submittal, DWR unfortunately forecast only $13 million in DA CRS revenues from SCE for all of 2003, and no revenues at all from either PG&E or SDG&E, an omission that prevented us from developing a better record on this item for the purposes of this decision.

D.02-11-022. In Commission Resolution E-3813, approving those advice letters with certain modifications, we directed PG&E and SDG&E to supplement their advice letters to reduce bundled customer power charge remittances according to the method adopted in Table C of D.02-12-045 to reflect DA CRS revenues. In simple terms, this method involved setting the bundled customer power charge assuming zero CRS revenues, then adjusting that charge by subtracting a component calculated by dividing assumed CRS revenues by DWR deliveries (SCE's advice letter had already incorporated this approach, and did not have to be supplemented). We directed further that DA CRS revenues shall be remitted to DWR, and observed that, "in this way, DWR shall be made whole from combined bundled and DA remittances, as directed in D.02-11-022 and D.02-12-045, and as modified." We will continue this approach in this decision. Accordingly, the IOU power charges in Table C of this decision have been revised to show that CRS revenues have not been estimated or deducted from the allocated DWR revenue requirement prior to calculation of the bundled customer power charges (other than the small amount that DWR forecasted for SCE in its July 1st determination). We leave that step to the IOUs in their advice filings as required by this decision. This places the burden on the IOUs and DWR to work together to ensure that the adjusted remittance rates accurately reflect actual DA CRS remittances for 2003.

Finally, we clarify that bundled customer commodity charges should not be changed with the implementation of these new power charges. For SDG&E, in D.02-12-064 we adopted procedures that allow SDG&E to accommodate these sorts of fluctuations in remittances to DWR. PG&E should continue to utilize its currently authorized accounting methodology, including the authorized accounting for use of "headroom." Given how we are treating PG&E and SDG&E in this decision, as well as the relatively short period of time remaining before we will again change the DWR power charges to implement their 2004 revenue requirement, it makes sense to treat SCE in a similar fashion.

Our second task in this decision is to allocate the $1.002 billion in excess DWR funds to IOU ratepayers. The customers of each utility will receive the same share of the reduction in the revenue requirement as they do of the revenue requirement itself. Based on the revised allocation percentages described above, this results in the allocation below:

	Share of Allocated DWR costs	Amount
PG&E	44.33%	$ 444,183,276
SCE	42.16%	$ 422,450,353
SDG&E	13.51%	$ 135,366,371
Total	100.00%	$1,002,000,000

Of course, things are often not as simple as they first appear. A number of parties make arguments regarding which customers should get the reduction. TURN and CFBF argue that the bill credit should go to the customers that pay the bond charge, on an equal cents per kWh basis. According to TURN, the only customers this would exclude would be CARE, medical baseline, and continuous DA, who are exempt from paying the bond charge. Everyone else, including departing load and usage up to 130% of baseline, would receive the benefit of the revenue reduction.

SDG&E divides its customers into classifications of “AB265 customers” and “ABX1 43 customers.” ABX1 43 customers would receive a rate decrease, while the share of reductions owed to AB 265 customers would go into SDG&E’s TCBA to pay down an undercollection attributed to those customers.

CLECA argues that rates should be decreased in proportion to the manner in which they were increased in D.01-05-064. CLECA would do this by "determining the percentage drop in system average rates sufficient to fully cover the revenue requirement reduction and then applying that percentage figure to the amount of the energy rate increases imposed on each schedule as a result of the June 2001 rate increase decision." (CLECA Reply Comments, p. 7.)

The proposals of SDG&E and CLECA are overly broad and overly complex, and go well beyond the scope of D.02-12-045. In that decision, we allocated the revenue requirement and set a new power charge on a per kWh basis to satisfy that revenue requirement. To remain consistent with that general approach, it makes the most sense for any adjustment we make today to also be on a per-kWh basis.[8]

The question remains as to whether the rate reduction should be allocated to customers paying the bond charge, or to customers paying the power charge. This is ultimately a policy question, as there would be a basis for either approach. D.02-12-045 adjusted the power charge to satisfy DWR's 2003 revenue requirement, and the carrying costs for the funds then held in the Operating Account and the Operating Reserve that have now become excess were included in those calculations of the revenue requirement and power charge. Accordingly, allocating the reduced 2003 revenue requirement via the power charge (or to those customers paying the power charge), would certainly be consistent with our previous decision. On the other hand, the initial need for the amounts now being returned to ratepayers resulted in more bonds being issued than otherwise would have been necessary. The larger bond size has resulted in

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[8] SCE also rebuts CLECA's argument with its observation that if the reduction is allocated on an equal-cents per kWh basis, large customers with lower average rates will receive a larger percentage rate reduction. (SCE Reply Comments, p. 6.)

larger Bond Charges, which suggests that the funds now being returned to ratepayers should go to those who pay Bond Charges.

The key difference is that the power charge is not paid by residential customers using less than 130% of baseline, while the bond charge is. Accordingly, an allocation based on the bond charge would flow the reduction to residential customers with usage under 130% of baseline, while an allocation based on the power charge would not.

We believe that the relief provided by the reduced DWR revenue requirement should be spread broadly, rather than narrowly. The bond charge paid by customers has gone to DWR, so all customers that have paid the bond charge have paid for costs relating to DWR's revenue requirement. Accordingly, we will adopt TURN and CFBF's recommendation to allocate the reduction to all customers that pay the bond charge. This strikes an appropriate balance, for while customers using under 130% of baseline will receive a relatively small credit (as their usage is relatively low), they will at least receive some credit.

Finally, the impacts on direct access and departing load customers need to be addressed. As adopted in D.03-07-030, the cost responsibility surcharge (CRS) applicable to DA and DL customers is currently capped at 2.7 cents/kWh. Thus, to the extent the DWR charge applicable to these customers exceeds proceeds available from the 2.7 cents CRS, the residual obligation is accounted for as an undercollection subject to recovery from DA/DL customers through future years' surcharge collections. Thus, to the extent that any of the reductions in the 2003 DWR revenue requirement are attributable to DA and DL customer obligations, although those reductions will be flowed through currently 100% to bundled customers by today's order, we will reduce the CRS undercollection to be paid off in future years.[9] The precise determination of the extent to which the DWR 2003 revenue reductions impact the CRS undercollections is beyond the scope of this proceeding, but will be addressed in R.02-01-011.

Returning the Money to Ratepayers

The most contentious issue in this proceeding is the question of when (and how) the reduction in DWR's revenue requirement will flow back to ratepayers. As noted in ALJ Allen's Ruling, the simplest approach under the Addendum is for there to be a reduction in the DWR Charges, which include the Power Charge and the Bond Charge. Other approaches are possible, but only with the agreement of the Commission and DWR. The approach initially proposed by DWR, as shown in Energy Division's examples, was to essentially shut off or reduce the flow of dollars received by DWR for a period of time adequate to adjust for the difference between the original and revised revenue requirements.

Because the amount at issue is quite large, the flow of dollars would need to be shut off for two or three months. If this were to be reflected in a rate reduction, that reduction would end around the end of the year. Some parties are concerned by this schedule, and have proposed alternative approaches.

SCE proposes to return the reduction to its customers over the course of 2004. Under SCE's proposal, DWR (or alternately SCE) would accumulate the dollars owed to SCE's ratepayers in a memorandum account, which would then be subtracted from the portion of DWR's 2004 Power Charge revenue requirement allocated to SCE's customers. In short, SCE's customers would see

[9] The DL Customers (in their comments on the draft decision) argue that there are some DL customers who will not have a CRS undercollection, but who ought to receive the benefit of this DWR revenue requirement reduction. If there are such customers, they will not be deprived of their share of the benefit, because they could receive a billing reduction in R.02-01-011.

the reduction over twelve months, beginning in January 2004. CFBF similarly would implement the revenue decrease as a bill credit, amortized over 12 months in 2004.

SDG&E would implement the reduction by means of a commodity rate decrease amortized over 15 months, beginning October 1, 2003. CLECA makes a proposal similar to that of SDG&E.

All of these parties basically argue that: 1) customer rate decreases could not be implemented before September or October of this year; 2) the decreases would probably last around two or three months; and 3) they anticipate that rates in general will rise on January 1, 2004 (at least in part because of DWR's 2004 revenue requirement). As a consequence, customers would see significant rate volatility, with rates dropping for a few months, only to pop back up even higher in January 2004. In order to mitigate that volatility, these parties would spread the reduction out over 2004.

The problem of short-term rate volatility is a valid concern,[10] but it is not clear that the solution recommended by these parties is the best approach. SCE and CFBF's approach, with reductions beginning in 2004, makes the supplemental determination pointless. Waiting until 2004 to implement the reduction (of the 2003 revenue requirement) means that DWR could have just incorporated the adjustment into its 2004 revenue requirement, rather than

[10] This volatility is exacerbated by DWR submitting its supplemental determination significantly later in the year than hoped for by this Commission. If the reduction in revenue requirement could have been implemented earlier in the year, we could have lowered rates promptly, passing through to ratepayers lower DWR charges for more of the year, and reducing the potential for rate shock when the reduction ended.

submitting a supplemental determination.[11] The proposal of SDG&E and CLECA is somewhat better, as it would result in an earlier implementation of any rate reduction, although the reduction itself would be smaller, as it would be spread out even further.

All four proposals advocate rate stability, so that customers do not experience significant rate increases when the rate reduction ends. The downside of such rate stability, however, is that customers similarly will not experience a significant rate reduction when it begins. Both the pain and the pleasure get spread out so as to be largely unnoticeable. In addition, the long-term amortization proposal would result in rate reductions not being complete until December 2004, but those reductions are to compensate for reserves that were no longer necessary beginning in January 2003. This means that customers will have to wait almost two years to be completely made whole for the money that they paid for reserves that are no longer necessary. Also, with customers leaving and entering the utilities' service territories, this delay increases the proportion of customers not getting back the money they paid, as well as the proportion of customers being compensated for payments they did not actually make.[12]

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[11] Implementing the decrease at the beginning of 2004 would offset other increases anticipated for the beginning of 2004.

[12] While the parties proposing long-term amortization all would have the rate decrease end in December 2004, there is nothing magical about that date, other than the fact that it corresponds to the anticipated duration of DWR's anticipated 2004 revenue requirement. A six-month amortization, for example, would return the money to ratepayers much sooner, soften the impact of any January 1, 2004 rate increase, and provide for more accurate price signals during the critical summer peak period in 2004.

TURN recommends that the reduction be distributed to ratepayers as quickly as possible via a one-time bill credit or refund check. ORA and the DL Customers also recommend an early one-time bill credit. From a customer standpoint the one-time bill credit is preferable, as it returns customers' money to them as quickly as possible. Most customers, if given the choice, would likely prefer an immediate refund to letting DWR (or their utility) hold onto their money for 12 to 15 months.

In addition, the one-time bill credit is a solution to the concerns regarding rate volatility. A customer who sees a small-to-moderate reduction in their bill over two or three months may begin to consider that the result of an ongoing change in rates, resulting in the potential for an unpleasant surprise when the rates go back up. On the other hand, a one-time credit, especially if it is clearly identified on the bill, is going to be less confusing, and more likely to be perceived as a unique windfall. This is reinforced by customer's utility rates remaining the same after the one-time credit, at least until January 2004, when we would typically make any rate changes necessary to collect DWR's 2004 revenue requirement.[13]

Initially, it was not clear whether a one-time bill credit was feasible. Under the terms of the Addendum, the Commission by itself can only adjust DWR Charges. Because of the large amount of excess DWR funds that will be returned to ratepayers, simply foregoing one month of Power Charge revenues would be insufficient to completely return $1.002 billion to IOU customers (unless, for example, the Power Charge became a negative number).

[13] DWR has not yet submitted its 2004 request to this Commission.

DWR's August 4 Memorandum indicates that DWR agrees to the use of a one-time bill credit. Given DWR's agreement, and the strong policy and fairness reasons for returning the money at issue to ratepayers as quickly as possible, we will adopt a one-time bill credit. The usage that the credit is based upon should be related to the usage that the customers paid for, so the credit should be calculated on the basis of the last 12 months of each customer's usage. This will ensure that customers with highly seasonal usage, such as agricultural customers and those customers with heavy summertime air conditioning use, receive a credit that most accurately reflects their total usage. Because the implementation of the one-time bill credit most directly impacts DWR's and the utilities' cash flow and accounting and billing systems, we leave the remaining details of implementation up to DWR and the utilities,[14] with the requirement that all affected IOU customers receive the bill credit within 45 days of the effective date of this decision.[15]

PG&E

The situation of PG&E is unique in two major ways. First, PG&E is currently in Chapter 11 bankruptcy. In proceeding I.02-04-026, this Commission is considering a proposed settlement of its bankruptcy litigation with PG&E. We have no desire for our action here today to limit our options in evaluating the bankruptcy settlement. For example, approval of the proposed settlement is one possible outcome of I.02-04-026, and we will not preclude or undercut that outcome here. Similarly, rejection of the proposed settlement is also a possibility,

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[14] In their comments on the draft decision, all three utilities have made implementation proposals.

[15] Inactive or former customers are authorized to receive checks (in lieu of a bill credit) to the extent specified in each utility's implementation proposal.

so this decision does not rely upon approval of the proposed settlement. As an overarching principle, this decision is not intended to limit or preclude any particular decision we may ultimately make in our consideration of the proposed bankruptcy settlement.

Second, PG&E owes DWR over $500 million for remittances relating to Western Area Power Administration (WAPA) loads. DWR initially estimated that the amount owed by PG&E was $539 million; PG&E claims that the correct number is $516 million; DWR's reply memorandum revises its estimate to $526 million, subject to certain adjustments. PG&E and DWR agree that for the 2001-2002 period, PG&E owes DWR $469 million. PG&E proposes to adjust DWR's revenue requirement by $23 million, to reflect the difference between DWR's $539 million estimate and PG&E's $516 million estimate. (PG&E Comments, p. 12.) Neither PG&E nor this Commission gets to adjust DWR's revenue requirement, and DWR expressly states that any changes due to variances from its figure will be accounted for outside of the supplemental determination. (DWR Supplemental Determination, p. 20.)[16] Accordingly, for purposes of this decision we will use the $526 million figure, with the acknowledgement that DWR may revise this number.

PG&E proposes to net or offset the amount it owes DWR with the approximately $444 million that DWR would otherwise be returning to PG&E's customers; so if PG&E owed DWR $526 million, PG&E would remit to DWR the difference, or $82 million, and essentially stop there. The problem with PG&E's proposal is that the funds coming from DWR and those going to DWR do not belong in the same pocket. The funds coming from DWR actually belong to

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[16] PG&E acknowledges the latter point in its comments on the draft decision.

PG&E's ratepayers, not PG&E.[17] If PG&E merely remitted the difference ($82 million in the above example), and kept the remainder, PG&E would effectively pocket $444 million in ratepayer money. Absent the bankruptcy proceeding and the proposed settlement, we would simply require PG&E to pay DWR the money owed, and DWR could then use that money to provide a refund or credit to all customers, including those of PG&E.

PG&E initially argued, in essence, that the $444 million cannot be returned to ratepayers because the proposed settlement calls for PG&E's retail rates to remain at current levels through December 31, 2003, and returning the money to ratepayers would effectively change PG&E's rates. A one-time bill credit, however, leaving existing rates in place, does not change PG&E's rates, and does not violate the terms of the proposed settlement. In its comments on the draft decision, PG&E appears to concede that a one-time bill credit, with existing rates left in place, would not violate the terms of the proposed settlement. Furthermore, the thrust of PG&E's comments seems to be that so long as PG&E is able to use an approach under which it "nets" its WAPA obligation against the amounts to be refunded to customers, PG&E could issue prompt bill credits to customers in the amount of $444 million. We believe PG&E's approach is workable, so long as it is modified to ensure that PG&E does not accumulate any

[17] PG&E generally fails to recognize that the dollars that PG&E collects from ratepayers for DWR are different from dollars that PG&E collects on its own account. This is also apparent in PG&E's argument that, for an immediate refund to occur, the Commission must rescind D.02-11-026 (PG&E comments on draft decision, pp. 4, 6). PG&E's argument relies on the revision that D.02-11-026 made to Ordering Paragraph No. 2 of D.01-03-082. However, that Ordering Paragraph deals with the uses that PG&E can make of the surcharge revenues it collects on its own account. (See, D.02-11-026, Attachment A, p. 7.) Accordingly, we do not need to rescind or even alter D.02-11-026 to allocate DWR's revenue requirement reduction.

ratepayer funds for its own account. To ensure that those ratepayer funds are returned to PG&E's ratepayers, and to ensure that DWR has adequate cash flow to fund the one-time bill credit for the other utilities, we will establish the following procedure. PG&E is to immediately remit to DWR the difference between (1) the amount that PG&E owes to DWR for WAPA payments (as calculated by DWR) and (2) the amount of excess DWR funds that are to be returned to PG&E ratepayers. For example, if PG&E owes DWR $526 million, and PG&E ratepayers will be receiving $444 million (out of the total amount of $1.002 billion in excess DWR funds), PG&E would immediately pay DWR $82 million. At the same time, PG&E and DWR would make the following accounting entries: PG&E's WAPA liability of $526 million would be marked as paid in full; DWR would mark as fulfilled its obligation to reduce its revenue requirement (for PG&E customers) by $444 million; and PG&E would make an accounting entry to place $444 million ($526 million minus $82 million), in a new Customer Credit Holding Account (CCHA).

The CCHA will be held in trust for DWR and will be used to provide bill credits in accordance with this decision, and will remain subject to Commission direction. The balance in the CCHA will be reduced to reflect the bill credits (and any checks) paid out by PG&E. The timing of the reductions in the CCHA balance to reflect the bill credits shall be in accordance with the collection curve contained in the PG&E/DWR Servicing Order. (In other words, the CCHA shall reflect bill credits consistent with when PG&E would otherwise expect to have received cash if it had billed those amounts, instead of granting bill credits). Because the CCHA consists of DWR monies, held in trust by PG&E to provide bill credits, the balance in the CCHA should earn interest at the 3-month commercial paper rate. PG&E should keep track of this interest, so that it can ultimately be returned to DWR. Any checks that remain uncashed will escheat to the State of California to the extent required by law. Any money remaining in the CCHA (other than interest) after conclusion of the bill credit (and check payment) program, shall be paid out to the benefit of PG&E's ratepayers, pursuant to a further order of the Commission. Except as modified by this decision, PG&E's bill credit plan is approved.[18]

PG&E also notes that in late 2002, it committed to several procurement contracts with renewable generators, but DWR entered into those contracts to serve as the creditworthy purchaser in lieu of PG&E. PG&E argues that under D.02-12-045, those contracts should not be part of the DWR revenue requirement allocated among the utilities, but rather should be directly assigned to the appropriate utility. (PG&E Comments, p. 13.) DWR appears to defer determination of this issue to the CPUC. (DWR Reply Memorandum, p. 3.) We agree with PG&E that the costs of such contracts should be directly assigned to the customers of the utility that entered those contracts. However, PG&E did not provide adequate information in this proceeding for us to identify the contracts or their quantities. Accordingly, the only action we take today is to indicate our general agreement with PG&E on this issue, and refer this matter back to PG&E and DWR for negotiation in light of this decision.

Comments on Draft Decision

Consistent with Commission Rule of Practice and Procedure 77.7(f)(9), we determine that public necessity requires reduction of the otherwise applicable comment period. The public interest in the Commission adopting a decision

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[18] PG&E's bill credit plan is further modified as follows: item #6 is modified so that the line item reads: "DWR Credit," item #11 is modified so that the statement regarding bill credit reads: "The Public Utilities Commission has ordered this one-time credit because of reduced Department of Water Resources costs associated with the energy crisis."

before expiration of the standard 30-day comment period clearly outweighs the public interest in having the full 30-day comment period.

In this case, the public, in the form of utility customers, will be receiving bill credits totaling approximately $1 billion. The public interest in receiving those bill credits as promptly as possible is very high. By comparison, the scope of this proceeding is very narrow, with the issues largely prescribed by our previous decision, D.02-12-045. Today's decision is a limited follow-up to that earlier decision. Accordingly, the public interest in having a full comment period is relatively low. Consistent with the prior ALJ Ruling establishing the schedule for this proceeding, comments were due by the close of business on August 28, 2003. Comments on the Draft Decision were received from PG&E, SCE, SDG&E, CLECA, TURN, ORA, the DL Customers, and the California Manufacturers & Technology Association (CMTA).[19]

We have made changes to the text of this Decision as a result of the Comments of the parties, and we thank the parties for their thorough and thoughtful input on an accelerated schedule. In general, the changes made as a result of the Comments are clarifications that are technical in nature, and are reflected as changes in the text of the document, rather than being discussed here. The exceptions are two significant changes from the Draft Decision that make our Decision today more similar to the Draft Alternate Decisions.

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[19] CMTA notes in its Comments that the Draft Decision did not reflect "the fact that CMTA timely filed comments in this proceeding." (CMTA Comments, p.2). The July 15 ALJ Ruling in this proceeding required that: "All documents that are served should also be served separately, via individual e-mail, to Administrative Law Judge Peter V. Allen at pva@cpuc.ca.gov. It is the sender's responsibility to ensure proper electronic service." ALJ Allen did not receive CMTA's comments, and from the e-mail printout submitted by CMTA, it appears that CMTA did not comply with the Ruling's requirement for separate, individual e-mail service on ALJ Allen.

First, based in large part on PG&E's Comments, we will not defer the bill credit to PG&E's customers as contemplated in the Draft Decision. Instead, PG&E's customers, like those of SDG&E and SCE, will also receive a prompt bill credit. Consistent with PG&E's request, we make clear that our action today is not intended "[T]o be inconsistent with the proposed settlement of PG&E's bankruptcy, and that the implementation of the bill credit is not intended to prejudge the bankruptcy settlement or to adversely affect the revenues and ratemaking necessary to implement the settlement if it is approved by the Commission." (PG&E Comments, p. 2; see also pp. 7, 12.) Our action today does not violate the provisions of the proposed settlement, nor does it prejudge the proposed settlement, nor does it upset the proposed settlement's financial underpinnings.

Second, we set the deadline for customers to receive the bill credits 45 days from the effective date of this decision, rather than the 60 days contemplated by the Draft Decision. We understand that this is an aggressive schedule, and we acknowledge that the utilities may have difficulty in fully completing the bill credits within 45 days, but we expect the utilities to make their best efforts to achieve this goal.

Assignment of Proceedings

Loretta M. Lynch and Geoffrey F. Brown are the Assigned Commissioners and Peter V. Allen is the assigned Administrative Law Judge for this phase of this proceeding.

Findings of Fact:

1. DWR has submitted a supplemental determination of its 2003 revenue requirement.
2. DWR's supplemental determination reduces its 2003 revenue requirement by $1.002 billion.

3. The attached Table C and Appendix A correspond to Table C and Appendix A in D.02-12-045, revised to reflect DWR's supplemental determination.

4. D.02-12-045 largely precluded re-litigation of the allocation methodology adopted in that decision for DWR's 2003 revenue requirement.

5. The reduction in DWR's 2003 revenue requirement will have an impact on direct access and departing load customers.

6. Issues relating to direct access and departing load are generally being addressed in another proceeding, R.02-01-011.

7. Customers have paid DWR-related costs through the Power Charge and the Bond Charge.

8. Allocating the reduction in DWR's 2003 revenue requirement to all customers that pay the bond charge will result in the largest number of customers benefiting from the reduction.

9. Amortizing the reduction through 2004 would reduce rate volatility, but would also delay customers' receipt of the reduction.

10. A one-time bill credit would be the most expeditious way to provide the reduction to customers, and would also reduce rate volatility.

11. DWR has agreed to a one-time bill credit.

12. PG&E owes DWR over $500 million for remittances relating to WAPA loads.

13. PG&E's proposal to net its WAPA payments against expected reductions for its ratepayers from DWR could result in PG&E retaining ratepayer money.

14. The creation of a new Customer Credit Holding Account (CCHA) would ensure that PG&E's ratepayers receive the reduction in DWR's 2003 revenue requirement.

15. PG&E is currently in Chapter 11 bankruptcy.

16. A proposed settlement of bankruptcy-related litigation is being considered in I.02-04-026.

Conclusions of Law

1. The allocation of the reduction in DWR's 2003 revenue requirement should be allocated to bundled customers by service territory consistently with D.02-12-045, on an equal cents per kilowatt-hour basis, based on usage over 12 months.

2. The attached Table C and Appendix A are consistent with D.02-12-045.

3. Issues relating to the impact of DWR's revenue reduction on direct access and departing load customers should be addressed in R.02-01-011.

4. The reduction in DWR's 2003 revenue requirement should be allocated to all customers that pay the Bond Charge.

5. The reduction in DWR's 2003 revenue requirement should be returned to customers via a one-time bill credit.

6. PG&E should remit to DWR the difference between the amount that PG&E owes to DWR for WAPA payments (as calculated by DWR) and the amount of excess DWR funds that should be returned to PG&E ratepayers.

7. PG&E's WAPA payments to DWR and the reduction in DWR's revenue requirement for PG&E customers should be made in part through accounting entries rather than cash transactions.

8. PG&E and DWR should use accounting entries to mark PG&E's WAPA liability as paid in full, and DWR should use an accounting entry to mark as fulfilled its obligation to reduce its revenue requirement for PG&E customers.

9. PG&E should make an accounting entry to place the amount of excess DWR funds in a new Customer Credit Holding Account (CCHA), to be held in trust for DWR and to fund the bill credit for PG&E's customers.

10. Requiring PG&E to immediately pay DWR for the WAPA remittances by the method described above, and to provide an immediate bill credit to its customers for the reduction in the DWR revenue requirement is not inconsistent with the proposed settlement of the bankruptcy litigation being considered in I.02-04-026.

O R D E R

IT IS ORDERED that:

1. The allocation of the reduction in the California Department of Water Resources' (DWR) 2003 revenue requirement by service territory is to be done consistently with D.02-12-045, as described above.

2. The charges shown in Table C shall go into effect immediately, and will remain in effect until further order of the Commission. Within seven days of the issuance of today's decision, SCE, PG&E, and SDG&E shall file, if necessary, advice letters with revised tariffs that reflect the charges adopted in this order. These new tariffs shall be effective as of the date of today's decision, subject to review by the Commission's Energy Division.

3. The reduction in DWR's 2003 revenue requirement is to be returned to bundled utility customers paying the bond charge via a one-time bill credit, as described above.

4. All bundled utility customers receiving the bill credit shall receive it no later than 45 days from the effective date of this decision.

5. The implementation of DWR's 2003 revenue requirement reduction for departing load and direct access customer groups will be determined in R.02-01-011.

6. PG&E is to immediately remit to DWR the difference between the amount that PG&E owes to DWR for WAPA payments (as calculated by DWR) and the amount of excess DWR funds that should be returned to PG&E ratepayers, as described above.

7. PG&E and DWR will make accounting entries marking PG&E's WAPA liability as paid in full, and DWR will mark as fulfilled its obligation to reduce its revenue requirement for PG&E customers, as described above.

8. PG&E will make an accounting entry to place the amount of excess DWR funds that should be returned to PG&E ratepayers in a new Customer Credit Holding Account (CCHA), as described above.

9. The CCHA will be held in trust for DWR, and will earn interest at the three month commercial paper rate with the interest to eventually be forwarded to DWR.

10. Funds will flow from the CCHA to ratepayers consistent with the collection curve, as described above.

11. Any remaining balance in the CCHA is subject to further Commission direction.

12. The Commission or Assigned Commissioner or Administrative Law Judge shall issue further orders or rulings as needed regarding the process and schedule of future phases of this proceeding.

This order is effective today.

Dated September 4, 2003, at San Francisco, California.

MICHAEL R. PEEVEY
President
CARL W. WOOD
LORETTA M. LYNCH
GEOFFREY F. BROWN
SUSAN P. KENNEDY
Commissioners

Table C

Calculation of IOU Power Charges Based Upon DWR Supplemental Determination

2003 DWR Expenses, Offset by Non-Ratepayer Revenues	
Power Costs	$4,627,763,007
Administrative and General Expenses	$48,501,501
Ancillary Services	$21,750,000
Less:	
Change in Operating Account Balance	($69,537,530)
Revenues from Sale of Excess DWR Power	($132,213,327)
DA CRS Revenue	($13,545,000)
Interest Earnings on Fund Balance	($32,254,427)
DWR Revenue Required from Ratepayers	**$4,450,464,224**

Allocation of Total Revenue Requirement	**PG&E**	**SCE**	**SDG&E**	**Total**
Variable Contract Costs	$139,501,598	$89,472,520	$147,198,760	$376,172,878
Fixed Costs	$1,863,552,057	$1,795,829,555	$462,697,264	$4,122,078,876
Ancillary Services	$9,641,703	$9,169,955	$2,938,342	$21,750,000
Adjustment to Operating Account	($30,150,829)	($28,371,312)	($11,015,389)	($69,537,530)
Total Revenue Requirement	$1,982,544,528	$1,866,100,718	$601,818,977	$4,450,464,224
2003 DWR Delivered Energy (kWh)	20,296,173,705	16,259,774,036	5,446,147,794	42,002,095,535

Components of IOU Power Charge ($/kWh)	**PG&E**	**SCE**	**SDG&E**	**Total**
❑ Variable Power Cost Component	$0.00687	$0.00550	$0.02703	$0.00896
❑ Fixed Power Cost Component	$0.09182	$0.11045	$0.08496	$0.09814
❑ Ancillary Services Cost Component	$0.00048	$0.00056	$0.00054	$0.00052
❑ Operating Account Adjustment	($0.00449)	($0.00449)	($0.00449)	($0.00449)
Total IOU Power Charge ($/kWh)	**$0.09467**	**$0.11202**	**$0.10803**	**$0.10312**

Appendix A

2003 DWR Supplemental Determination

Methodology for Allocation of Revenue Requirement

Note: The allocation of the 2003 DWR Supplemental Determination revenue requirement is based on the allocation methodology authorized by the CPUC in D.02-12-045.

1. <u>Calculate each IOU's portion of DWR supplied energy, which is adjusted for Pre-DA migration.</u>

a) Calculate the proportion of DWR and URG supplied energy in each IOU's resource portfolio

Line	GWh	PG&E	SCE	SDG&E	Total	Source
1	Supply from URG					Removed after IOU review--these values are not used in the allocation calculations
2	Supply from DWR	24,017	20,026	6,314	50,358	DWR Financial Model (IOU Tabs)
3	Total Supplied Energy					Line 1 + Line 2 (Removed after IOU review--these values are not used in the allocation calculations)
4	URG % of IOU Portfolio					Line 1 / Line 3 (Removed after IOU review--these values are not used in the allocation calculations)
5	DWR % of IOU Portfolio					Line 2 / Line 3 (Removed after IOU review--these values are not used in the

						allocation calculations)

b) Adjust the amount of DWR supplied energy for each IOU by adding Pre-DA migration factor to DWR supplied energy. In addition, subtract DWR's share of surplus energy from DWR supplied energy.

Line	GWh	PG&E	SCE	SDG&E	Total	Source
6	Direct Access	8,154	11,044	3,479	22,677	DWR Financial Model (IOU_DA Tabs)
7	Departing Load	0	0	0	0	Data not available
8	DWR Share of Surplus Energy*	(1,832)	(2,215)	(547)	(4,594)	DWR Financial Model (IOU Tabs)
9	DWR Supplied Energy Adjustment	6,322	8,829	2,932	18,083	Line 6 + Line 7 + Line 8
10	DWR Share of Portfolio	30,340	28,855	9,246	68,441	Line 2 + Line 9
11	% DWR Supplied Energy	44.33%	42.16%	13.51%	100%	Line 10 / Total Line 10

* Off-system sales volumes are directly assigned to IOUs based on 2003 actuals and ProSym forecasts. Consequently, it is no longer necessary to calculate off-system sales as was done in D.02-12-045 Appendix A.

2) Calculate the adjusted DWR Revenue Requirement and allocate to each IOU

a) Start with DWR's 2003 Supplemental Determination Revenue Requirement

Line	2003 DWR Revenue Requirement		Source
12	Power Costs	$4,627,763,007	DWR Supplemental Determination, Table A-1
13	Administrative & General Expenses	$48,501,501	DWR Supplemental Determination, Table A-1
14	Change in Operating Fund Balance*	$0	
15	Ancillary Services	$ 21,750,000	DWR Supplemental Determination, Table A-1
16	**Less:**		
17	Revenue from Surplus Sales**	$0	
18	Interest Earnings on Fund Balance	$(32,254,427)	DWR Supplemental Determination, Table A-1
19	DA CRS Revenue **	$0	
20	DWR Revenue Requirement	$4,665,760,081	(Sum of Lines 12 - 15) - (Sum of Lines 17 - 19)

*Operating fund balance is initially set to zero and then calculated once everything else has been allocated to the IOUs. See step 2.e
** Revenue directly assigned to the IOUs. See step 2.d.

b) Calculate each IOU's supplied energy allocation factor by dividing each IOU's portion of DWR supplied energy by the total DWR supplied energy

Line	**GWh**	**PG&E**	**SCE**	**SDG&E**	**Total**	**Source**
21	% DWR Supplied Energy	44.33%	42.16%	13.51%	100%	Line 11

c) Determine each IOU's share of the DWR Revenue Requirement by multiplying the adjusted DWR Revenue Requirement by each IOU's supplied energy allocation factor.

Line		**PG&E**	**SCE**	**SDG&E**	**Total**	**Source**
22	Adjusted DWR Revenue Requirement				$4,665,760,081	Line 20
23	% Adjusted DWR Supplied Energy	44.33%	42.16%	13.51%	100%	Line 21
24	IOU Share of Adjusted DWR Revenue Requirement	$2,068,315,968	$1,967,117,758	$630,326,356	$4,665,760,081	Line 22 * Line 23

d) Reduce each IOU's share of the DWR Revenue Requirement by the portion of off-system sales and DA CRS revenue assigned to each IOU.

Line		PG&E	SCE	SDG&E	Total	Source
25	IOU Share of Adjusted DWR Revenue Requirement	$2,068,315,968	$1,967,117,758	$630,326,356	$4,665,760,081	Line 24
26	DWR's share of Surplus Sales Revenue *	$55,620,610	$59,100,728	$17,491,989	$132,213,327	DWR Financial Model (IOU Tabs)
27	DWR's share of DA CRS Revenue **	$0	$13,545,000	$0	$13,545,000	DWR Financial Model (IOU Tabs)
28	IOU Share of DWR Revenue Requirement less surplus sales and DA CRS revenue	$2,012,695,358	$1,894,472,031	$612,834,366	$4,520,001,754	Line 25 - Line 26 - Line 27

* Off-system sales revenues are directly assigned to each IOU based on 2003 actuals and ProSym forecasts. Consequently, its no longer necessary to calculate off-system sales as was done in D.02-12-045 Appendix A. However, due to revenue from other sources, total "Other Power Sales" is approximately $20 million higher than the total of DWR's share of OSS revenue. The additional surplus revenue was allocated to the individual IOUs on a prorata basis.

** DA CRS revenues are directly assigned to each IOU based on 2003 actuals and DA CRS forecasts generated by DWR's financial model.

e) Solve the DWR model to determine the additional revenue, or revenue reduction, that is required to maintain the operating account balance at or above $344 million, as well as provide DWR with its requested year-end balance and then allocate that over/undercollection to the IOUs to determine the final DWR Revenue Requirement allocation.

Line		**PG&E**	**SCE**	**SDG&E**	**Total**	**Source**
29	IOU Share of Adjusted DWR Revenue Requirement	$2,012,695,358	$1,894,472,031	$612,834,366	$4,520,001,754	Line 28
30	Operating Account*	($30,150,829)	($28,371,312)	($11,015,389)	($69,537,530)	Model solution: Operating Account Power Charge component * DWR deliveries from 9/5/2003 onward (line 46 * line 48)
31	Final allocation of DWR Revenue Requirement	$1,982,544,528	$1,866,100,718	$601,818,977	$4,450,464,224	Line 29 + Line 30

* The DWR financial model needs to be solved with rates found in lines 43 - 45 to determine change to Operating Account (OA) funding levels.

3) Remittance Rate Calculation

a) Determine the amount of dollars to be remitted for variable costs, fixed costs, ancillary services, and operating fund balance.

Line		PG&E	SCE	SDG&E	Total	Source
32	Allocation Factor	44.33%	42.16%	13.51%	100%	Line 21
33	Adjusted Rev Req.	$2,082,614,248	$1,980,716,455	$634,683,805	$4,698,014,508	(Sum of Lines 12 - 15) * Line 32
34	Less:					
35	Variable Costs	$139,501,598	$89,472,520	$147,198,760	$376,172,878	DWR Workpapers Provided to Energy Division
36	Ancillary Services	$9,641,703	$9,169,955	$2,938,342	$21,750,000	Line 15 * Line 32
37	Interest Earnings	$14,298,280	$13,598,696	$4,357,450	$32,254,427	Line 18 * Line 32
38	Off-System Sales	$55,620,610	$59,100,728	$17,491,989	$132,213,327	Line 26
39	DA CRS	$0	$13,545,000	$0	$13,545,000	Line 27
40	Fixed Costs	$1,863,552,057	$1,795,829,555	$462,697,264	$4,122,078,876	Line 33 - (sum of lines 35 - 39)
41	Change in Operating Fund Balance	($30,150,829)	($28,371,312)	($11,015,389)	($69,537,530)	Line 30

b) Calculate the specific DWR remittance rates

Line		PG&E	SCE	SDG&E	Total	Source
42	2003 DWR Delivered Energy (kWh)	20,296,173,705	16,259,774,036	5,446,147,794	42,002,095,535	DWR Financial Model (IOU Tabs)
43	Variable Costs ($/kWh)	$0.00687	$0.00550	$0.02703	$0.00896	Line 35 / Line 42
44	Fixed Costs ($/kWh)	$0.09182	$0.11045	$0.08496	$0.09814	Line 40 / Line 42
45	Ancillary Services ($/kWh)	$0.00048	$0.00056	$0.00054	$0.00052	Line 36 / Line 42
46	Operating Account ($/kWh) *	($0.00449)	($0.00449)	($0.00449)	($0.00449)	Model Solution
47	Total IOU Power Charge ($/kWh)	$0.09467	$0.11202	$0.10803	$0.10312	Sum of Lines 43 - 46

* To determine the final power charge needed to exactly achieve DWR's required Operating Account (OA) funding levels, the model needs to be solved for the power charge component found on line 46. This power charge component is multiplied by DWR deliveries to each IOU from 9/5/2003 through 12/31/2003 to calculate the values on line 41. The deliveries for this period are shown below.

48	DWR Delivered Energy, 9/5/2003 – 12/31/2003 (kWh)	6,709,358,338	6,313,368,755	2,451,215,861	15,473,942,954	DWR Financial Model (IOU Tabs)

(END OF APPENDIX A)